

21 MAG 10886



Edward C. Robinson Jr.
Assistant United States Attorney

Before: THE HONORABLE KEVIN NATHANIEL FOX
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
	:	
- v. -	:	Violations of 18 U.S.C.
	:	§§ 875, 2261A, and 2.
WERONIKA JANCZUK,	:	
	:	COUNTY OF OFFENSE:
Defendant.	:	NEW YORK
	:	

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SOUTHERN DISTRICT OF NEW YORK, ss.:

GEORGE LANE, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(Threatening Interstate Communications)

1. From in or around April 2020 through at least in or around August 2021, in the Southern District of New York and elsewhere, WERONIKA JANCZUK, the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, JANCZUK emailed a investment fund partner ("Victim") a series of violent, threatening, harassing, and intimidating messages in which JANCZUK threatened to kill the Victim and his relatives.

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT TWO
(Cyberstalking)

2. From in or around April 2020 through at least in or around August 2021, in the Southern District of New York and

elsewhere, WERONIKA JANCZUK, the defendant, knowingly and with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, to wit, the Victim, used the mail, interactive computer services and electronic communication services and electronic communication systems of interstate commerce, and other facilities of interstate and foreign commerce, to engage in a course of conduct that (a) placed the Victim in reasonable fear of the death of and serious bodily injury to a person, and (b) caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to the Victim and the Victim's immediate family members, to wit, JANCZUK emailed the Victim a series of violent, threatening, harassing, and intimidating messages in which JANCZUK threatened to kill the Victim and his relatives.

(Title 18, United States Code, Sections 2261A(2) (A),
2261A(2) (B) and 2.)

The bases for my knowledge and the foregoing charge are, in part, as follows:

3. I am a Special Agent with the FBI and have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement agents and other people, my examination of documents, videos, reports and records, and my involvement in this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Based on my conversations with the Victim, I know that the Victim is a partner who works for an investment fund located in New York, New York.

5. Based on my participation in this investigation, including my review of records from email providers, conversations with the Victim and his relatives, as well as my training and experience, I have learned that a person who, as described further below, I have identified as WERONIKA JANCZUK, the defendant, sent hundreds of violent, threatening, harassing, and intimidating email messages to the Victim from multiple

email accounts. Those messages include, but are not limited to, the following emails:

a. On or about April 17, 2020, JANCZUK wrote to the Victim, in substance and in part:

Subject: Cuntz: You've Made Me Orgasmic
Message: [Victim]: I swear that I will kill you.

b. On or about June 12, 2021, JANCZUK wrote to the Victim, the Victim's sister ("Victim's Sister"), and the Victim's brother ("Victim's Brother"), in substance and in part:

Subject: Existential Proof | INFJ Patterns - x
Message: I WILL SERIOUSLY CASTRATE YOU.

c. On or about June 13, 2021, JANCZUK wrote to the Victim, in substance and in part:

Subject: Feet intertwined, x3.
Message: So, yes - literally, felt the spiritual matter of your cum, and yes, you can anoint in the Spirit someone enough to make them orgasm. Kiss. Bite. Clit.

d. On or about June 15, 2021, JANCZUK wrote to the Victim's Brother in substance and in part:

Subject: Wedding List | Tertio Seminar 2018
Message: [Victim's Brother] - I will kill you for this.

e. On or about June 15, 2021, JANCZUK wrote to the Victim, in substance and in part:

Subject: Sex/Physicality Intent - Caught Vis.
Message: I will seriously kiss-kill your beautiful little white ass....

f. On or about June 18, 2021, JANCZUK wrote to the Victim, in substance and in part:

Subject: Tell me about my voicemail to three
Message: BUT I SWEAR TO GOD I WILL KILL YOU.

g. On or about June 18, 2021, JANCZUK wrote to the Victim and the Victim's Sister, in substance and in part:

Message: The time has come: *Talitha dei, arise.* You will die existentially, in the days, weeks, and months to come, each of you, each of your children, each of your networks, if you do not relent – and know that you will never find me, and never escape the degree to which I shall haunt thee, every day, every hour, every minute, every second, every millisecond, until you surrender to the hour.

h. On or about June 28, 2021, JANCZUK wrote to the Victim regarding the Victim's Sister, in substance and in part:

Subject: 2021.06.28 10.36pm Ontology of Experience of [Victim's Sister], with Jews, in Legal Performance
Message: I love you so much it hurts, [Victim's Sister], and I seriously want to kill you, if this was in any shape or form personalized.

6. Based on my conversations with the Victim and Victim's Sister, I know that the Victim and the Victim's Sister was at their respective places of employment in Manhattan, New York when they received and/or reviewed each of the above emails.

7. Based on my review of the content of the email messages and of subscriber and other information for multiple Gmail addresses (the "JANCZUK Gmail Accounts") and the Yahoo email address (the "JANCZUK Yahoo Account") that sent the above and other messages, I have learned the following:

a. The first name of the subscribers for all of the JANCZUK Gmail Accounts is reported as "Weronika." The last name of the subscriber for one of the JANCZUK Gmail Accounts is reported as the last name of the Victim and was created subsequent to WERONIKA JANCZUK, the defendant, meeting the Victim.

b. As reported, the subscribers for both the JANCZUK Gmail Accounts and the JANCZUK Yahoo Account have the same date of birth (the "JANCZUK DOB") and the same phone number (the "JANCZUK Phone").

c. The email messages from the JANCZUK Gmail Accounts list the sender as "Weronika Janczuk" or "Weronika" followed by the Victim's last name. The email signatures also list the sender as "Weronika Janczuk" or "Weronika" followed by the Victim's last name and list the JANCZUK Phone. The email

signatures for certain email messages from the JANCZUK Yahoo Account list the sender as "W.E.J.S.", which first three letters are the initials for JANCZUK's name and the last letter is the initial for the Victim's last name.

8. Based on the foregoing and my training and experience, I believe that WERONIKA JANCZUK, the defendant, is the user of the JANCZUK Gmail Accounts and JANCZUK Yahoo Account and that JANCZUK is the sender of the messages described above.

9. Based on my involvement in the investigation, my conversations with the Victim and the Victim's Sister, review of law enforcement reports, and court filings, I have learned the following:

a. JANCZUK's last listed address is in Minneapolis, Minnesota.

b. On or about April 16, 2020, JANCZUK sent an email to the Victim and the Victim's Sister ("Email-1"), listing the address for the Victim's parents, which is not in Minnesota, and wrote in part that "Google maps shows 17.5 hours. . .please tell mama and papa, that I'll be at your doorstep at the end of Friday morning, as best as I can, huh."

c. I have reviewed a photo of a speeding ticket addressed to "Weronika E. Janczuk" from Kankakee, Indiana. According to the ticket, JANCZUK was speeding, in Kankakee, Indiana, at 107 miles per hour on April 19, 2020, three days after Email-1 was sent.

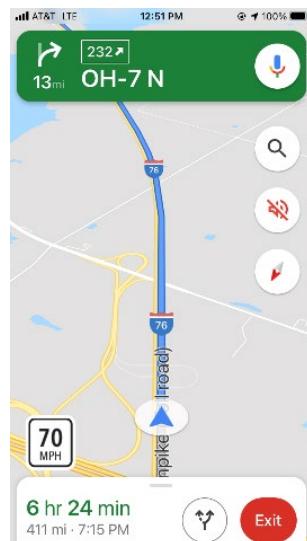
d. On or about May 28, 2020, the Victim obtained an order of protection issued in the District Court of the County of Dakota, State of Minnesota, by Judge Arlene M. Perkkio, docket number 19 HA-CV-20-2141, which remains in effect until May 28, 2022. The order directs JANCZUK to stay away from the Victim, and the employment, home, and business of the Victim, and to refrain from communication by all means including email. The county sheriff served JANCZUK with the order of protection.

e. On or about July 23, 2020, the Victim's Sister obtained an order of protection issued in the First District Court of the County of Dakota, State of Minnesota, by Judge Arlene M. Perkkio, docket number 19 HA-CV-20-2590, which remains in effect until July 23, 2022. The order directs JANCZUK to stay away from the Victim's Sister, and the employment, home, and business of the Victim's Sister, and to refrain from

communication by all means including email. On or about July 23, 2020, at approximately 10:33 a.m., JANCZUK was electronically served with the order of protection.

f. On or about June 12, 2021, at approximately 3:32 p.m., JANCZUK sent an email to the Victim, stating in sum and in part: "No Shit that '[Victim]' has a 'restraining order' in a city in which he 'scaffolds' every street spiritually" ("Email-2").

g. On or about June 17, 2021, at approximately 12:51 p.m., JANCZUK sent an email to the Victim's Sister, stating in sum and in part: "Ladies & gents – confirming (near) entrance into Pitt, where I will find something fit to eat, and still intend to hit NYC metro area by 9pm." ("Email-3"). The email also included what appears to be a screenshot of a maps application, which is pictured low:



Based on my review of historical cellphone location information obtained pursuant to a judicially authorized warrant for the JANCZUK Phone, I have learned that at approximately 2:31 p.m. JANCZUK was in the vicinity of Interstate 76 approximately an hour from Pittsburgh, Pennsylvania. I have also learned that on or about June 15, 2021, JANCZUK started traveling from the vicinity of Minneapolis, Minnesota across Wisconsin, Illinois, Indiana, Ohio, Pennsylvania, and New Jersey to New York City, arriving on or about June 18, 2021.

h. On or about June 30, 2021, JANCZUK was arrested in Long Island, New York for violating the order of protection preventing her from contacting the Victim.

i. On or about July 1, 2021, the Victim obtained an order of protection issued in the District Court of the County of Nassau, State of New York, by Judge Lisa M. Petrocelli, docket number CR-009426-21NA, which remains in effect until June 30, 2022. The order directs JANCZUK to stay away from the Victim, and the employment, home, and business of the Victim, and to refrain from communication by all means including email. JANCZUK was present in court when the order of protection was issued and signed the order of protection.

j. On or about July 5, 2021, at approximately 3:00 p.m., a woman was stopped by the security at Victim's Sister's place of employment (the "Office") in Manhattan, New York, for attempting to gain access to the Victim's Sister's office. The Victim's Sister was shown a photo of the woman by security and identified her as JANCZUK.

k. On or about July 6, 2021, at approximately 1:30 p.m., the Victim observed JANCZUK at his place of employment in Manhattan, New York (the "Office-2").

l. On or about July 8, 2021, at approximately 10:45 a.m., the Victim's Sister observed JANCZUK in the lobby of the Office.

10. Based on my conversations with the Victim and the Victim's Sister, I know that the messages that WERONIKA JANCZUK, the defendant, sent to the Victim and his sister have caused them great emotional distress and that they fear that JANCZUK will kill them or harm their family members. For example:

a. Based on fear that JANCZUK would harm the Victim's parents, security cameras were installed at the Victim's parent's residence.

b. In or around June 2021, the Victim moved his parents from their residence to his own residence out of concern for their safety.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of WERONIKA JANCZUK, the defendant, and that she be arrested, and imprisoned or bailed, as the case may be.

s/George Lane by KNF, USMJ
GEORGE LANE
Special Agent
Federal Bureau of

Investigation

Sworn to before me by reliable electronic means, pursuant to
Federal Rule of Criminal Procedure 4.1

12 Day of November 2021

Kevin Nathaniel Fox

THE HONORABLE KEVIN NATHANIEL FOX
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK